



September 19, 2007

Mr. Kevin Adler  
Remedial Project Manager  
United States Environmental Protection Agency  
Region V – Mail Code SR-6J  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

RE: Outboard Marine Corporation, Waukegan, Lake County, Illinois  
Five Year Review Report

Dear Mr. Adler:

The Illinois Environmental Protection Agency ("Illinois EPA") has reviewed the Third Five Year Review Report dated September, 2007. Illinois EPA concurs with the findings of the report.

Specifically, the Illinois EPA agrees that:

The Waukegan Harbor operable unit (OU #1) remedial action is not protective of human health and the environment because the previous removal actions cleanup level of 50 ppm PCB was too high. A further cleanup remedy needs to be performed using a lower PCB cleanup level.

The remedial action for the Waukegan Manufactured Gas and Coke Plant operable unit (OU#2) is currently being implemented and efforts are being made to control exposure pathways that could result in unacceptable exposure risks. Therefore, the remedial action is not yet protective of human health and the environment but is expected to be upon completion.

However, Illinois EPA would like to add a comment restating its concerns regarding the proposed change from mixed use industrial to high density residential as this change applies to protectiveness. Illinois EPA is still concerned that future residents may be exposed to a level of risk due to the difference in length of time of exposure despite the proposed inclusion of a three-foot clean soil cover for all residential areas. This cover will virtually eliminate the ingestion pathway, but the inhalation pathway may still be relevant. An appropriately conducted evaluation for indoor and outdoor exposure should be conducted after the completion of U.S.EPA's remedy

The PCB Containment Cells operable unit (OU #3) appears to be protective of human health and the environment. The cells are complete and appear to be operating as designed.

The OMC Plant 2 operable unit (OU#4) remedial action is expected to be protective of human health and the environment upon completion, estimated to be in 2012. Currently, multiple contaminants in and around OMC Plant 2 potentially or actually cause exposures to pollutants or hazardous substances.

Thank you for your continued commitment to address the remediation goals of the OMC NPL Site and your coordination of work with Illinois EPA.

If you have any questions regarding this matter, please contact me at 217-785-8725.

Sincerely,

Erin J. Rednour, Remedial Project Manager  
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Illinois Environmental Protection Agency  
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